# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

**BRONINA RUSLANA OLEGOVNA** 

MATSUMOTO, J.ORIGINAL

(full name (s) of the plaintiff or petitioner applying (each person must submit a separate application))

-against-

CV 16-0586
(Provide docket numbs) if a liable; if high this SCANLON, Mwith your complaint, you will not yet have a docket number)

PRESIDENT OF RUSSIAN FEDERATION VLADI INTERNATIONAL MONETARY FUND AND	MIR PUTIN .
OTHER.,	DECEIVED
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	FEB 0 1 2016
(full name(s) of the defendant(s)/respondent(s))	
	PRO SE OFFICE

## **Honorable Chief District Judge Carol Bagley Amon!**

Right Honorable judge, Since the courts of the United States are an example of fair justice for the majority of countries of the world and the last hope at protecting fundamental human rights and democracy, I would like to express my deep reverence and the sincere belief in the fair consideration of my complaint.

Let me inform you, that I, as a plaintiff, fulfilled the requirements of Rule 8 of the Federal Rules of civil procedure and filed a complaint. To the complaint are added two copies of the complaint and copies of the documents that are attached to the original.

In taking a complaint to the legal proceedings, I'll be ready to send a copy of the complaint with the documents that are attached to it, to the defendant, who is in Ukraine - to the Prime Minister of Ukraine A.P. Yatsenyuk.

In view of the high status of the defendants and of possible pressure from their part by me, a public publicity through a Jury Trial could as much as possible help realize the right to justice. However, I am unable to pay the court fee, in this connection asking for a Jury Trial in his complaint may be additional burdens for the court financially and time-bound. Therefore, the issue of attracting a Jury Trial ask the court to consider, at its discretion.

If necessary, I'm ready as quickly as possible to fulfill all the recommendations and observations of the court on this complaint.

Focus attention of the court on the fact, that financial compensation of violated rights is not the subject of this complaint, and the subject of the complaint is to restore my rights and justice in the fight against international corruption.

With deep respect, 08.01.2016

Plaintiff: BRONINA RUSLANA OLEGOVNA-

### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

To the US District Court for the Eastern District of New York Honorable Chief District Judge Carol Bagley Amon United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201 USA,

### **Bronina Ruslana Olegovna**

against '

**President of Russian Federation Vladimir Putin** International Monetary Fund and other

#### Parties:

#### Plaintiff:

citizen of Ukraine, Bronina Ruslana Olegovna, public activist and human rights defender, member of the Coalition anti-corruption organizations

Address:

Post address: Ukraine, Kiev, 03087, str. Umanskaya, 31, building 2

E-mail: blacklisteu@mail.ru Tel.: +38067 398-80-57

#### Defendant 1:

President of the Russian Federation Vladimir Vladimirovich Putin Address: 23, Ilyinka Street, Moscow, 103132, Russia

#### Defendant 2:

Prime Minister of Ukraine Arseny Petrovich Yatsenyuk Mailing address: Ukraine, 01008, m. Kyiv, str. Grushevskogo 12/2, Telephone: +38 044-253-77-99

#### Defendant 3:

International Monetary Fund

Address: 700 19th Street, N.W., Washington, D.C. 20431 USA

publicaffairs@imf.org,

media@imf.org, ngoliaison@imf.org, communityrelations@imf.org

#### Defendant 4:

Azarov Nikolai Yanovich

Whereabouts unknown

(I sent the request to the Ministry of Internal Affairs of Ukraine (document Nº14 - attached) about the whereabouts of the defendant. According to the information from the Ministry of Internal Affairs of Ukraine N. Azarov was wanted. However, N. Azarov systematically during 2015 conducted a public press conference in Moscow (Russian Federation).

#### COMPLAINT

Guided by the United States Federal law on offenses against foreigners (Foreign Relations Authorization Act), according to which a foreign citizen can complain to the US court on the foreign country or the officials of his country in case of, if have been violated fundamental principles of international law, protecting human rights, in accordance with Article III, Section 2 of the US Constitution, I am Bronina Ruslana Olegovna, citizen of Ukraine, appeal to US District Court for the Eastern District of New York District Court for protection of my fundamental rights, which have been violated by unlawful actions higher officials of Russia and Ukraine, and also for the protection of the rights of US citizens, because the state of USA is the main financial donor of the financial system of

Ukraine, and therefore, the USA taxpayers' rights also violated by unlawful actions higher officials of Russia and Ukraine.

## My complaint is based on the following.

Higher officials of Russia and Ukraine by collusion in violation of more than 10 norms of the national and international legislation have used their powers for the implementation of large illegal interstate financial transactions, as a result have been violated of the fundamental my rights, the rights of citizens of my country and citizens of the United States, namely: the right to property, on justness, to participate in decision-making.

So, in 2013, President of Russian Federation Vladimir Putin with the aim of counteraction to the will of the Ukrainian people and its strategic choice on the integration of Ukraine into the European Union, at a meeting of the intergovernmental commission of Decemver 17, 2013 publicly exceeded his authority, In violation of the laws of the Russian Federation, suggested to the President of Ukraine Viktor Yanukovych to implement the procedure of a loan by Ukraine \$ 3 billion, and in the further increase it up \$ 15 billion, to prevent the lending to the tune of \$ 15 billion, proposed by the International Monetary Fund to Ukraine, and thereby, to eliminate the IMF from lending to Ukraine and significantly to strengthen financial Ukraine's dependence on Russia.

Implementation of the plan of the President of the Russian Federation Vladimir Putin on blocking of IMF loans to Ukraine and the illegal withdrawal of \$ 3 billion from the Russian Federation to Ukraine was carried through government agencies of Ukraine by a significant number of official crimes of high officials of Ukraine and Russia, as well as falsifications and fakes by all participants in the procedure aforementioned loan, namely: the President of the Russian Federation Vladimir Putin, aware that proposed by him procedure of the loan for Ukraine entails his personal criminal responsibility and can become the basis for impeachment, refused to carry out the previously taken him public commitments to formalize an agreement with Ukraine about loan terms on \$ 15 billion and \$ 3 billion. Thus, there was no a formal agreement about the specified loans, and order of credit transfer procedure by placing bonds Ukrainian foreign borrowing on the Irish Stock Exchange at all stages conducted by higher officials of Ukraine and the Russian the criminal way.

#### About falsification of agreement.

Instead of a formal loan agreement from Russia to Ukraine \$ 3 billion Vladimir Putin and Ukrainian corrupt officials have used criminally their official position to deceive the people of Russia and Ukraine and the world community, including international financial institutions, for what was created a public myth on the official level about the existence of an intergovernmental agreement between Ukraine and the Russian Federation about 3 billion loan. Such myth is constantly supported through state institutions of Ukraine and Russia, including and the media. In reality such an agreement does not exist and never was.

Unfortunately, a low professionalism of experts of the International Monetary Fund (IMF) when assessing the status of the loan by Ukraine \$ 3 billion, not allowed to expose the fraud already at the first stage and allowed by corrupt officials to avoid exposure. National Bank of Ukraine, Ministry of Foreign Affairs of Ukraine, Administration of President of Ukraine have provided us official information about the absence of the aforementioned loan agreement, absence also information, who signed agreement and when (Document No5 – attached). The Honorable Court may make a request to make sure, that the agreement about loan by Ukraine from Russia \$ 3 billion is a myth and officials, which without proof speak about presence such an agreement are corrupt and fraudsters.

About the illegal withdrawal of \$ 3 billion of money of the Russian people from the Russian Federation to Ukraine.

President of the Russian Federation V. Putin, based taken by him public commitments on the allocation of funding for Ukraine, using his official position, publicly instructed the Ministry of Finance of the Russian Federation to withdraw from the National Welfare Fund of the Russian Federation (hereinafter - NWF) \$ 3 billion for Ukraine.

However, such public instruction is unlawful, because the right allocation of funds from the NWF of the Russian Federation, legislatively enforced by Government Decision of the Russian Federation dated 19 January 2008 № 18 "On the Management of assets of National Welfare Fund»

and in accordance with this Government Decision №18 at the moment of placement of bonds of external borrowing of Ukraine on the Irish Stock Exchange 24 December 2013 Ukraine has been excluded from the list of foreign states, in which can be placed funds of NWF of the Russian Federation in the form of securities.

Therefore, Vladimir Putin not only purposely took illegal decision about placing funds of NWFRF of the Russian Federation in the Ukrainian securities in violation of the acting legal acts, and has exceeded its powers, that is a felony and gives all grounds to begin impeachment proceedings of the President of the Russian Federation, but further he did nothing for correction of this offense.

#### About official negligence of V. Putin and unlawful inactivity.

The main and the only document confirming the legality of Ukraine's intention to pay or not to pay \$ 3 billion to Russia is a law of Ukraine on the state budget. The Parliament of Ukraine by adopting the Law of Ukraine "On State Budget for 2015" in December 2014, has ignored by this law the return to Russia of \$ 3 billion. The deputies the Parliament of Ukraine on behalf of Ukrainian people have not provided not a single cent for repayment December 20, 2015 loan of \$ 3 billion for Russian Federation, which been issued 20. 12.2013 for a period of 2 years, ie until 20.12.2015.

Despite the fact that Ukrainian power as far back as December 2014 publicly informed to Russia and Vladimir Putin that Ukraine does not intend to pay Russia in 2015 to \$ 3 billion. debt and even such payment is prohibited by law return \$ 3 billion without making changes to Law of Ukraine "On the State Budget for 2015" is not possible and illegal, Putin and his government have not used their official position to protect the interests of their people and have showed criminal official negligence, and unlawful inactions to protect the rights of its state, namely:

-within a year never once have not appealed to Ukraine officially with a request to amend the Law of Ukraine "On the State Budget for 2015" concerning the payment of a debt of \$ 3 billion to Russia

- within a year never has not followed official protests or requests from the President of Russia (Document №4 – attached) on the fate of the debt President of the Russian Federation did not use the right of Russia to apply to the court for the cancellation of a legislative ban by Parliament of Ukraine on the return of debt.

Thus, the above facts and circumstances indicate about gross violation by V. Putin demands of anti-corruption legislation, which guarantees the protection of my rights and the rights of my fellow citizens in managing of public finances, protection against international financial corruption scams and corruption collusion.

- 1. Below I point out the violation of legislative norms:
- 1.1. Putin had violated p. 2 (e) of the Article 9 of the UN Convention against Corruption 2003, by him is not satisfied the requirement of UN Convention about conducting adjustments in connection with the failure to observe laws by allocation of public funds from the NWF of the Russian Federation. Also is not satisfied adjustment to eliminate the corruption factors into transparency and reporting of management of public finances.
- 1.2. Inflicted damage the fundamental rights to information by falsifying information and the introduction of deception through the creation of a public myth on the official level about the existence of an interstate agreement between Ukraine and the Russian Federation about 3 billion loan, prescribing reporting, management of public finances and the legality of borrowing money from the NWF of the Russian Fund for Ukraine, which violates paragraph 1 (b) of Article 13 of the UN Convention against Corruption 2003 ensuring the right for population on effective access to information.
- 1.3.Putin had violated Article 17 of the Universal Declaration of Human Rights which guarantees to everyone people the right hold property alone as well as in association with others. Nobody can be arbitrarily deprived of own property. V.Putin, against the will of the Ukrainian people, entered into collusion with the highest leadership of Ukraine and has introduced corruption scheme the withdrawal and illegal use of funds of the Russian Federation in the amount of \$ 3 billion through structures of Ukraine, having assigned a forced of payment of debt for perhaps plundered funds in the amount of \$ 3 billion to the Ukrainian people, that is not less than \$ 70 for every citizen.

- 1.4. V.Putin had violated Art. 34 of the UN Convention against Corruption, does not providing the correction of situation, elimination of consequences of corruption and termination of crimes related to the procedure of the loan to \$ 3 billion, which listing was given in my statements, that were sent by me to the President of Russia V.Putin systematically. And until now, the legislature of the Russian Federation did not grant the right of borrowing money from the National Welfare Fund of the Russian Fund for Ukraine.
- 1.5. V.Putin to obtain benefits in the work on counteraction the will of the Ukrainian people in Ukraine's integration with the European Union, but not with Russia, and by fraud way strengthening the financial dependence of Ukraine from Russia violated my fundamental rights to justness and protection of citizens against international corruption, enshrined by the Convention of the Organization for Economic Cooperation and Development on Combating Bribery of Foreign Public Officials in International Business Transactions in 1997 (Law about participation of the Russian Federation in this Convention has been ratified by the State Duma on 13 January and was approved by the Federation Council 25 January 2012), entered into a corrupt conspiracy with a Prime Minister of Ukraine Nikolay Azarov and their further joint actions in the interests of V.Putin despite the will of the Ukrainian people are classified in accordance with Article 1 the OECD Convention as bribery an official person and are subject to liability, namely:
  - Putin's actions with respect to Azarov qualifies as inducement official person to violate his official obligations, with the result that Azarov has violated the oath public servant honestly serve the Ukrainian people.

The essence of violations of rights, signs of a corruption collusion against the interests of the Ukrainian people between Vladimir Putin and higher officials in Ukraine are as follows.

The role of the Prime Minister of Ukraine N. Azarov (during the period from 11 March 2010 to 28 January 2014.) in the implementation of strengthening of the financial dependence of Ukraine from Russia in the interests of Putin and the facts of abuse of official position by N. Azarov for system crimes.

- 18.12.2013 N. Azarov without the prior permission of the Verkhovna Rada of Ukraine, had exceeded its authority and autocratically has prepared and approved by his personal signature governmental falsified document about borrowing \$ 3 billion from Russia Resolution of the Cabinet of Ministers of Ukraine dated 18 December 2013 №904 "About the effectuation of state external borrowing in 2013" (hereinafter Resolution №904) (Document №3 attached), with the result that he has committed two crimes:
- has exceeded on \$ 3 billion, the amount of state debt of Ukraine, prescribed into the Law of Ukraine "About the budget for 2013";
- has falsified the text of the governmental document Resolution №904, referring from nonexisting norms of the Law of Ukraine "About the Budget for 2013".

Detailing offenses of N. Azarov and violations by him of the rights of the Ukrainian people, including my personal rights, consists of the following:

- 1. At the moment of approval 18. 12.2013 Resolutions №904, signed personally by N. Azarov, the amount of state debt of Ukraine, which was envisaged by the Law of Ukraine "About the State Budget of Ukraine for 2013" has already been completely exhausted. And at the Ukrainian government there was no legal basis increase the national debt by new borrowing.
- 2. Therefore, before approving Resolution №904 on new borrowing, the Government of Ukraine was at first to get the new law on behalf of the Ukrainian people for permission on a new borrowing (additional borrowing state budget), and then on the basis of changing by the Verkhovna Rada (new) law to approve Resolution №904.
- 3. As of 18.12.2013 a new law about additional borrowing of the state budget by Verkhovna Rada had not been adopted.
- 4. Azarov has falsified Resolution №904, referring to the norms of the old law, which forbade additional borrowings above permissible limit. Such actions of the Prime Minister of Ukraine in accordance with Ukrainian legislation as well as Article 19 of the UN Convention against Corruption are qualified as a criminal abuse of official position. (Earlier, Prime Minister of Ukraine Yulia

Tymoshenko for less proven abuse of power received a prison sentence of 7 years, but N. Azarov fled to the creditor in Russia, which is an additional proof of collusion with V.Putin.

- 5. The bonds of Ukraine released the Ministry of Finance of Ukraine 24.12.2013, for placement on the Irish Stock Exchange are completely illegal, because:
  - have been issued on the basis of fraudulent Resolutions №904, Resolution №904 was not corrected until today;
  - was blocked by the signing of the interstate official agreement on the terms of placement of bonds for a loan from the NWF of the Russian Federation;
  - when issuing of bonds for placement on the Irish Stock Exchange in Dublin, made a big scam by the Ukrainian government to transform the bonds in soap bubble instead of government borrowing documents. The Russian Federation at the moment these bonds issue no longer needed in them, because the money in the amount of \$ 3 billion has already been submitted to the National Bank of Ukraine on the eve of (a day earlier) as a charitable gratuitous assistance to Ukraine and bonds issued after December 24, 2013 g have remained not paid to this day. The fact of the transfer of such bonds with Irish Stock Exchange is theft Ukrainian of the securities, is unlawful seizure of securities for blackmail.
- 6. Moreover, by the Government of Ukraine (through the Ministry of Finance of Ukraine) was grossly violated the Law of Ukraine "On state procurement" and by criminal way without competition illegally attracted to the placement of bonds on the Irish Stock Exchange in Dublin the Russian bank "VTB". For complicity of VTB Bank in the implementation of the "soap securities" the Ukrainian government has transferred \$ 450,000 of the money of taxpayers of Ukraine in favor of subsidiary company of VTB Bank "VTB Capital plc", (London) (for aforementioned corrupt services rendered).

For such a criminal payment of services of VTB Bank on placement "soap bonds" 3 March 2015 in Spain, was arrested a former member of the Government of Azarov Minister of Finance of Ukraine Yuriy Kolobov. The Bank "VTB" money of "VTB Capital plc" to this day did not return and none of the higher officials of Ukraine and Russia did not require such refund, which indicates that all parties of charitable of transfer of money to Ukraine are satisfied and claims do not have a. Also this fact confirms the version about intention of Russia to gift money to Ukraine and the issue of « soap securities» carry out for switching attention.

Thus, on the basis of the above facts, N. Azarov violated my rights enshrined by the UN Convention against Corruption 2003, namely:

- Art. 9: The management of public finances
- -Art. 13: Participation of society
- Art. 19: Abuse of official position
- Art. 24: Concealment
- -Art. 34: Consequences of acts of corruption

# The role of the Irish Stock Exchange on criminal withdrawal of money from Russia to Ukraine.

To maximize conceal fraud by criminal withdrawal of money from Russia to Ukraine there are signs of collusion or bribery of officials of the Irish Stock Exchange and therefore the Irish Stock Exchange has taken over a major role in a public deceiving of taxpayers of Russia and Ukraine and conceal the illegal withdrawal of money from Russia.

Officials of the Irish Stock Exchange used their positions to simulate buyout of "soap" government bonds of Ukraine and placed bonds in the stock exchange listing only 24.12.2013, that one day later than were sent \$ 3 billion to National Bank of Ukraine.

Consequently, the bonds that were on the listing of the Irish Stock Exchange, starting from 24.12.2013, were to be paid or 24.12.2013 or later, or returned to the issuer of the securities, that is Ukraine.

However, the stock exchange has created a precedent of scams and has used the listing of stock exchange is not for a honest sale of bonds, and to covering up the withdrawal and laundering of money of Russian people in Ukraine. Since by Russian law directly prohibited by to issue money under the Securities of Ukraine, but to gift money from the NWF of Russia gratuitous directly not

prohibited, that, apparently, Russian Government decided bypass the law and gift the money to Ukraine. Therefore, bonds were issued for the switching of attention.

\$ 3 billion, that by Russia has been listed 23.12. 2013 to the National Bank of Ukraine, have no documentary support which would confirm their status as loan, but not gift (Document Nº9, Document Nº6 – attached).

Since the Russian Government has not:

- 1. Interstate agreements on borrowings for Ukraine money from the NWF of Russian Federation.
- At the moment of transfer \$ 3 billion, 23.12.2013 on the Irish Stock Exchange were no bonds of external borrowing of Ukraine, therefore such transfer can not be considered as payment for non-existent bonds.
- 3. Official requirements from Russia to Ukraine demanding return of money directed not to destination, no.

The absence of an intergovernmental agreement to create all conditions for theft of money from such a charitable payment of Russia straight from the Exchange.

The report on use by Ukraine the above mentioned money (\$ 3 billion) nor Azarov, nor the new government of Ukraine till today have not given and no measures to remedy illegality of the procedure of placement of bonds on the Irish Stock Exchange has not been made, that confirms the corrupt aforethought and collusion of participants scam.

Thus, on the Irish Stock Exchange occurred fact of financial fraud, The Russian Government, in fact, stolen the money from own people and handed them over as a gift, without any obligations to Ukraine, using for this corrupt collusion with the Irish Stock Exchange in gross violation of English law .

The total impunity for the creation of financial fraud for the withdrawal of money from Russia - falsification of documents and possible collusion V.Putin, N.Azarov and the Irish Stock Exchange and led to the commission of new offenses and the involvement of new figurants of concealing fraud, namely:

- 1. At the international level: the International Monetary Fund he carried out illegal expert estimation, based on the falsified documents, that has helped legitimize the scam (detailed below).
- 2. At the internal level in Ukraine: continued implementation of the scam against the rights and freedoms of the Ukrainian people by the new Government of Ukraine (detailed below).
- 3. By Azarov before escaping in Russia have been appointed corrupt officials in key positions in the departments of the Ministries of Ukraine, influencing the formation of government policy to control for credits and state debt.

For unknown for me reasons, new Prime Minister of Ukraine Arseniy Yatsenyuk contrary to the Law of Ukraine "On the cleansing power" not fired appointed by Azarov officials he allowed them to continue (until today) complete assignments of executors and controllers the scam and for that falsify documents, including for the international financial organizations, and in full use their positions, that by documents to support the above scam.

# <u>Detalization of violations of the law and my rights from the side of International</u> Monetary Fund.

My accusations against the International Monetary Fund regard to the imposition illegal expert assessment about the status of the transfered by Russia for the benefit of Ukraine \$ 3 billion as a state debt of Ukraine, resulting in have been violated my rights, the rights of US citizens was created the threat to strengthen of financial dependence of Ukraine from Russia and payment the scams at the expense of US taxpayers, are based on the following:

The International Monetary Fund has violated my rights, having ignored my repeated appeals (Document №12, Document №13 – attached) addressed to all divisions of the Fund about taking measures against systematic falsification and corruption, forgery and exceeding official authority by all parties to the process of unpaid listing of the Ukrainian bonds on the Irish Stock Exchange and transfer of \$ 3 billion. from Russia to the National Bank of Ukraine as a Christmas gift because the

other documents and agreements of Refutation this version at the moment of transfer of money from Russia, ie as of 23.12.2013 was not and there is no until today.

Experts from the International Monetary Fund when determining the status of the debt have used their official position to conceal the crimes of corruption of Putin and the heads of the Cabinet of Ministers of Ukraine, the former and current and, apparently, and have used not the documents, namely bribes. My arguments are based on the fact, that the experts of the International Monetary Fund are not considered a single important document neither from the Russian side, nor on the Ukrainian side, nor from Ireland Irish Stock Exchange and their report was built on the words of the person concerned in the concealment of the above offenses – the Minister of Finance of the Russian Federation A. Siluanov. Perhaps, by him paid by the blindness and total incompetence of the IMF experts, namely the experts:

- 1. Have concealed the fact of illegal withdrawal of money from Russia and the absence of a separate decision of the Government of the Russian Federation on the basis of the Resolution of the Government of the Russian Federation of December 19, 2013 №1194. The absence of a separate decision of the Government of the Russian Federation indicates, that that the procedure for placing in debt to Ukraine has not been changed in accordance with the RF Government Decree of December 19, 2013 №1194, and, consequently, the prohibition put means of National Wealth Fund (NWF) in securities of the state with "higher-risk" remains in force and, respectively, the withdrawal of money to Ukraine carried out by the Ministry of Finance of Russian Federation is illegal for bonds. But to give such funds a legislative ban does not exist in Russia, therefore 23.12.2013 and was carried out a Christmas gift for a brotherly Ukraine.
- 2. Have hidden the fact of absence of an intergovernmental agreement between Ukraine and the Russian on the implementation of state external borrowing in 2013.
- 3. Have hidden the fact of systemic machinations in 2013-2014 of multiple placement of bonds of Ukraine at the Irish Stock Exchange, which have never were not bought out.
- 4. Have hidden100% falsification Resolution of Cabinet of Ministers of Ukraine of December 18, 2013 №904 «About state external borrowings in 2013."
- 5. Have hidden, that does not take into account the fact that had been arrested ex-Finance Minister of Ukraine Yuri Kolobov for the illegal placement of the bonds on the Irish Stock Exchange and the use of money Ukrainian budget in a large amount for the payment to division of VTB Bank of Russia for services on the creation of a fraud at Irish Stock Exchange with Ukrainian bonds.
- 6. Have hidden the fact of absence of the report of the Cabinet of Ministers of Ukraine for the use of \$ 3 billion of the money received by Ukraine from Russia .23.12.2013.
- 7. In violation of Art. 13 of the UN Convention against Corruption 2003, refuses to accept the information on corruption.

Thus, on the basis of the foregoing allegations the IMF completely has taken public stance of concealing corruption crimes on the Irish Stock Exchange and a gross violation of the requirements of the UN Convention against Corruption, 2003. Report about the status of a charitable transferring \$ 3 billion from Russia 23.12 . 2013 as the state loan is falsified and illegal, and on set of the above facts by the IMF were violated my fundamental rights, Law Foreign Corrupt Practices Act 1977 and Art. 13, 34 of the UN Convention against Corruption.

Thus, on the basis of facts outlined above the IMF has violated my rights enshrined by the UN Convention against Corruption:

- Art. 10 Public reporting
- Art. 13 Participation of society
- Art. 19 Abuse of position
- Art. 24 Concealment
- Art. 34 The consequences of acts of corruption

Considering, that based on their falsified expert reports, the IMF public informs, that is going to cover the looted \$ 3 billion, received 23.12.2013 by Ukraine from Russia, by US taxpayers' money, which are the main donors to the Fund, therefore such encouragement of swindlers violates the fundamental rights of US taxpayers and donor countries IMF.

# <u>Detalization of violation of legislation - my rights by the Prime Minister of Ukraine</u> <u>Arseny Yatsenyuk (personally), holds a position in the period from February 27, 2014 and incumbent Prime Minister of Ukraine.</u>

By me during the 2014-2015, in order to counter and expose the corrupt scam on representation of Russia, N. Azarov, the Irish Stock Exchange as the state loan of Ukraine \$ 3 billion on the basis of the UN Convention against Corruption, international and national anti-corruption legislation have been prepared and sent to the address of Prime Minister of Ukraine A.Yatsenyuk (personally), the Cabinet of Ministers of Ukraine and the President of Ukraine a number of proposals, requests and requirements on prohibition movement of payment on external borrowings of \$ 3 billion, immediate freezing and the subsequent cancellation of the corrupt debt of Ukraine in the amount of \$ 3 billion. (Document None attached).

In response to those suggestions, request and demands I received:

From the side of the President of Ukraine:

Official confirmation that the interstate agreement between Ukraine and Russia about borrowing \$ 3 billion does not exist. (Document Nº27—attached).

Such a response was sent to my address from the Presidential Administration and the Ministry of Foreign Affairs of Ukraine on the orders of the President of Ukraine.

From the Prime Minister of Ukraine A. Yatsenyuk (personally) systematically manifested itself illegal inactivity, total violation of anti-corruption legislation and the use of his official position for concealing of the aforementioned financial the scam, namely:

- 1. Prime Minister of Ukraine AP Yatsenyuk, as N.Azarov has not informed to the population of Ukraine, including me, on what purposes and to what extent have been used to \$ 3 billion, received 23.12.2013 by National Bank of Ukraine from Russia without accompanying documentation and, accordingly, without limitation on their use.
- 2. Ministry of Finance has provided falsified references about existence of an agreement about borrowing \$ 3 billion from Russia, which in reality does not actually exist. Such information from Ministry of Finance of Ukraine illegally contrary to the information from Ministry of Foreign Affairs and the National Bank of Ukraine. (Document №11: a copy of the reference№31-12120-27/28-702/715 from 17.11.2015—attached).
- 3. The Ministry of Finance of Ukraine, referring to the designation A. Yatsenyuk, more than a year systematically covers up all crimes N. Azarov, committed by him against the interests of the Ukrainian people, falsifies for this the official references in matter of external borrowing of Ukraine at the rate of\$ 3 billion. (Document №11: a copy of the reference №31-12120-27-27/711 from 13.01.2015—attached).
- 4. A.Yatsenyuk received from me during 1.5 years of anti-corruption appeals on the above matter, grossly violates my rights and does not take measures in accordance with paragraph 4 of Article 8 of the UN Convention against Corruption, according to which a public official is obliged to inform the competent authorities about acts of corruption about which he has become aware in carrying by his functions. However, A.Yatsenyuk neither transferred neither to the Prosecutor office of Ukraine or the Security service of Ukraine, any other competent authorities the facts of corruption and fraud related by transfer \$ 3 billion from Russia to Ukraine.
- 5. A.Yatsenyuk has deprived me of the right to participate in decision-making as enshrined paragraph 1 (a) of Art. 13 of the UN Convention against Corruption increased transparency and facilitating involvement of the population decision-making processes and promote the active participation of individuals and groups outside the public sector, such as civil society, nongovernmental organizations and organizations, which function on the base of communities, in preventing corruption and combat it.
- 6. A. Yatsenyuk, in violation of paragraph 1 of Article 12 of the UN Convention against Corruption blocks all proposals on carrying out audit and the establishment of proportionate civil legal, administrative or criminal sanctions against participants of scam borrowing \$ 3 billion.
- 7. A. Yatsenyuk has deprived me of the right to information enshrined p. 1 (b) of Art. 13 of the UN Convention against Corruption- ensuring that the public has effective access to information

Document 1

and continues jointly with the Ministry of Finance of Ukraine misleading the Ukrainian people about the existence of an agreement of borrowing \$ 3 billion.

- A. Yatsenyuk illegally used his official position and not sent requests or complaints to the Russian and international organizations, including the IMF, about the criminal nature of the procedure of loan of \$ 3 billion at the Irish Stock Exchange, for organization of which was arrested and is to this day in prison in Spain the previous Minister Finance of Ukraine Y.Kolobov.
- A. Yatsenyuk illegally does not use the Ukrainian legislation, which provides protection measures for annulling of agreements, which were concluded against the will of the people.

Such norms of direct action to annul the anti-popular agreements or transactions are stipulated in the following laws:

- Art. 228 of the Civil Code of Ukraine;
- part 1 of Art. 207, the Economic Code of Ukraine;
- Art. 208 of the Economic Code of Ukraine;
- Art. 34 of the UN Convention against Corruption

The above-described illegal actions on the part of the President of the Russian Federation V. Putin, ex-Prime Minister of Ukraine N. Azarov, the Irish Stock Exchange, the current Prime minister of Ukraine A. Yatsenyuk and the International Monetary Fund, and systematic violation of my rights forced me to carry out 1.5 years of dangerous and difficult work for exposing the above shady transaction with the Ukrainian bonds and protect my rights.

This long-term work requires a large financial costs (for example, only 200 international letters, protests, requests, demands and appeals have been prepared and sent by mail or courier to the departments and companies from different countries).

Such my work and work of my minded and the results of my intellectual (property) in exposing a major interstate the scam, I can not estimate lower than double the amount from the amount that the state of Ukraine immediately paid for the intellectual work of the Russian company "VTB Capital plc" in the amount of \$ 450 000 for the placement and sale of bonds on the Irish Stock Exchange, Therefore, based on moral and business principles, my work for the restoration of rights and fairness needs to be evaluated not less than \$ 900,000.

In case of using the above-described results of my intellectual activity, I intend to defend in court not only property rights but also intellectual property rights.

I ask the court to take into account, that the financial compensation of violated rights is not the subject of this a complaint.

The subject of this a complaint is to restore of my rights and fairness in the fight against international corruption. Therefore, on the basis of the above facts, arguments and being guided by :

- US federal law on offenses against foreigners (Foreign Relations Authorization Act)
- UN Convention against Corruption 2003
- Convention of the Organization of Economic Cooperation and Development on Combating Bribery of Foreign Public Officials in International Business Transactions 1997
- Universal Declaration of Human Rights
- -False Claims Act 1863
- -Wall Street Reform and Consumer Protection Act 2011
- -Foreign Corrupt Practices Act 1977
- -The Freedom of Information Act (FOIA)

#### **ASK THE COURT:**

1. To recognize the inaction on elimination systemic corruption violations in the provision of \$ 3 billion of financial assistance to Ukraine from the National Welfare Fund of the Russian Federation, of the President Vladimir Putin, International Monetary Fund, former Prime Minister of Ukraine N. Azarov and acting Prime Minister of Ukraine A. Yatsenyuk such, that violates the requirements of Art. 34 of the UN Convention against Corruption, 2003 on the elimination of the

Document 1

consequences of corrupt acts, which led to the violation of the property my rights and my fellow citizens.

- 2. To recognize the actions of the International Monetary Fund and the acting Prime Minister of Ukraine A. Yatsenyuk such that violate my rights in the fight against corruption, guaranteed by Article. 13 of the UN Convention against Corruption in 2003.
- 3. To recognize illegal the expert evaluation of the IMF about the status of the transferred by Russian Federation 23.12.2013 \$ 3 billion to the National Bank of Ukraine as a sovereign Ukraine's debt before Russia. To oblige IMF to review this estimate, taking into account the fact, that that the bonds for the recognition of sovereign debt (loan) of Ukraine have been placed on the Irish Stock Exchange only 24.12.2013, and the transfer of \$ 3 billion by Russia was made much earlier, without any interstate agreements, is necessary to assess as the status of donations or the money laundering scam.
- 4. To oblige the Cabinet of Ministers of Ukraine and the Central Bank of Ireland (address: PO Box 559 Dame Street Dublin 2 D02 P656 Ireland) restore the rights to elimination of consequences of corruption, as guaranteed by Art. 34 United Nations Convention against Corruption, 2003 and carry out with my obligatory participation the audit financial assistance at the ammount of \$ 3 billion, directional by Russia to the benefit of Ukraine in the third decade of December 2013, to establish the legitimacy of the use of these funds, the movement of these means, and also what mechanisms have implemented to protect against thievery and laundering of these funds under the control of the Right Honorable Court and the United States Securities and Exchange Commission (SECHeadquarters 100 F Street, NEWashington, DC 20549 USA.
- 5. To oblige the President of Ukraine to establish within one month a commission with my participation to investigate the facts of the use the status of special anti-corruption body by National Anti-Corruption Bureau of Ukraine to conceal the major international financial scams with participation higher officials of Ukraine and laundering in Ukraine in 2013-2014 of \$ 3 billion from National Welfare Fund of the Russian Federation.

### The list of documents that are attached to the COMPLAINT:

- 1. APPLICATION TO PROCEED WITHOUT PREPAYING FEES OR COSTS.
- 2. A copy of the passport of citizen of Ukraine - Ruslana Olegovna Bronina.
- 3. Document №3: A copy of the falsified resolution of Cabinet of Ministres of Ukraine dated December 18, 2013 №904 «On public external borrowing in 2013", signed personally by N. Azarov (1p.)
- 4. Document №4: A copy of the statement of R. Bronina to the Prime Minister of Ukraine Arseniy Yatsenyuk and Russian President Vladimir Putin on the termination of forcing upon of corrupt debt to Ukraine (2 p.)
- Document №5: A copy of reference from the Ministry of Foreign Affairs of Ukraine 5. number 913 / 36-172 / 3-1672 from 19 November 2015 about the absence of an Interstate agreement between Russia and Ukraine about the state loan of \$ 3 billion in December 2013 (1 p.)
- Document №6: A copy of reference from the National Bank of Ukraine №18-02013 / 87541 from 13 November 2015 addressed to the R. Bronina about the absence of an Interstate agreement between Russia and Ukraine about the state loan of \$ 3 billion in December 2013 (1 p.
- Document №7: A copy of reference from the Presidential Administration of Ukraine №12-08 / 1713 from 13 November 2015 addressed to the R. Bronina about the absence of an Interstate agreement between Russia and Ukraine about the state loan of \$ 3 billion in December 2013 (1 p.)
- 8. Document №8: A copy of the letter - proposal personally to A.Yatsenyuk № 0142014/1 from 20 November 2014 about support of my anti-corruption work to annul the corrupt of the financial scam, committed in December 2013 by N. Azarov and Vladimir Putin in the form of a loan of \$ 3 billion and also the beginning of the use of public powers for conducting the purchasing procedure for annulment of this corrupt financial transactions (2 p.)
- Document №9: A copy of the letter from the Central Bank of the Russian Federation №10-1-4/2432 from 18.03.2015, addressed to the R.Bronina about illegal banking financial

manipulations and the scams, including in the implementation of financial assistance Russia for Ukraine in the amount of \$ 3 billion. (1 p).

- Document Nº10: A copy of the pre-trial inquiry from R. Bronina to President of the Russian Federation V. Putin Nº01511120345 from 11 December 2015 and the Russian Government with a request to refute the fact of absence of an Interstate agreement between Russia and Ukraine about loan by Ukraine of \$ 3 billion (1 p.)
- Documents Nº11: A copy of the references from the Ministry of Finance of Ukraine Ne31-12120-27/28-702/715 from 17.11.2015 (2p.) and №31-12120-27-27/711 from 13.01.2015 (1p.), that are falsifying the true information about corruption, forgery and abuse of authority by higher officials of Ukraine and Russia when implementing the scam with the withdrawal of \$ 3 billion in December 2013 from Russia to Ukraine.
- Document №12: A copy of the complaint protest against financial fraud of V. Putin at the expense of EU and US taxpayers (№ 01599111428 from 27.11.2015, addressed to the Managing Director of International Monetary Fund Ms. Christine Lagarde (2p.)
- Document 13: A copy of the statement on the recognition of the debt in the amount of \$ 3 billion Ukraine before Russia as a corrupt (Nº0159014273 from 06.10.2015, addressed to the Managing Director of International Monetary Fund Ms. Christine Lagarde (2p.)
- 14. Document 14: A copy of the request No 01591141562 from 30.09.2015 about the whereabouts of the defendant - Azarov Nikolai Yanovich, directed to the Minister of Internal Affairs of Ukraine (in person), registered and duly stamped of the Ministry of Internal Affairs of Ukraine 01.10.2015.

Date: 08.01.2016

Plaintiff:

Bronina Ruslana Olegovna

Tel.: +38067 398-80-57

DOCN2

ПАСПОРТ ГРОМАДЯНИНА УКРАЇНИ ПАСПОРТ ГРАЖДАНИНА УКРАИНЫ

Броніна
Русмана
Очечівка
вересня 1990 року
исто Первошацієк
шкомаї вської

Нация насторга

DOCN 3



# КАБІНЕТ МІНІСТРІВ УКРАЇНИ ПОСТАНОВА

від 18 грудня 2013 р. № 904 Київ

# Про здійснення державних зовнішніх запозичень у 2013 році

З метою виконання Закону України "Про Державний бюджет України на 2013 рік" Кабінет Міністрів України **постановляє**:

- 1. Здійснити державні зовнішні запозичення шляхом випуску облігацій зовнішньої державної позики 2013 року (далі облігації).
- 2. Затвердити Умови випуску облігацій зовнішньої державної позики 2013 року, що додаються.
  - 3. Міністерству фінансів:

здійснити випуск облігацій згідно із затвердженими цією постановою Умовами;

під час складання проекту Державного бюджету України на відповідний рік передбачати кошти для погашення та обслуговування облігацій.

Прем'єр-міністр України

M.A3APOB

Інд. 70





# Coalition of anti-corruption organizations Public Court of Ukraine

03087, Ukraine, Kiev, Post box 27, tel.: +38 067 398-80-57, e-mail: blacklisteu *a* mail.ru

ДЛЯ РОЗГЛЯДУ НА ЛЮСТРАЦІЙНІЙ КОМІСІЇ

№15046 от 29.10.14

Премьер-Министру Украины А.П.Яценюку Копия: Президенту Российской Федерации В.В. Путину

# Заявление о прекращении коррупционных схем навязывания долгов Украине и преступной бездеятельности финансовых учреждений

17.12.2013 р. Президент Российской Федерации В.В.Путин и Президент Украины В.Ф. Янукович договорились о предоставлении Украине кредита в размере 15 миллиардов долл. без чётких программ и проектов их использования, тем самым, заложив основы для безнаказанного его разворовывания по коррупционным схемам.

Члены Коалиции антикоррупционных организаций Общественный Суд Украины (далее - КАО ОСУ) в рамках проекта «Чёрный список антиславян» расследования о финансовых махинациях путём предоставленного кредита для Украины и выявили схему по перекачке и отмыванию денег через Украину: деньги из России под видом кредитования выводятся в Украину, а затем мгновенно скрытно и бесконтрольно трансформируются уже в частный капитал, используя для этого государственный ресурс финансовых учреждений и продажных коррупционеров - чиновников финансовых учреждений. В результате - государство Украина не только возмещает уворованные по сговору кредитные средства, но еще и огромный % в размере около 250 млн.долл. Ранее подобное «финансирование» Украины осуществлял ЕБРР (к примеру, на фиктивно построенных за их деньги автодорогах сейчас массово бастуют водители из-за непроходимости и развала таких «отремонтированных» дорог. В итоге - дорог нет, а многомиллиардный долг у государства есть.) А теперь и с Востока под надуманным поводом навязывают Украине долги уверенные в безнаказанности Министр финансов России А.Силуанов по сговору с высшими должностными лицами Украины, руководители правительства Украины Николая Азарова-Сергея Арбузова, а именно: в декабре 2013 осуществлен вывод 3 миллиардов долларов из России, которые Янукович по сговору с главой НБУ Соркиным и главой Минфина Украины обналичат, а деньги вывезутся из Украины как частный капитал. Денег нет, зато есть новейшее вооружение боевиков на Донбассе, Януковича нет, зато у украинской армии осталось ржавое оружие, а Россия, приютив Януковича, требует не только 3 млрд.долл., но еще и расчитывает, что за такую махинацию Украина должна платить огромные % (сотни млн. дол.) Уже в декабре 2014 Россия ждет от Украины унизительные для Украины уворованные средства за обслуживание воровства коррупционного долга, а к декабрю 2015 - полной оплаты.

-14-

Наши расследования показали, что у Российской Федерации нет доказательств, чтобы опровергнуть наши обвинения. Деньги РФ направила в Украину не для укрепления ресурсов украинского народа, а для личного обогащения членов команды Януковича как плату и поощрение за ослабление и развал страны, за избиение и запугивание украинцев.

Доказательства с нашей стороны.

1. Никто из чиновников Минфина Украины не предоставил отчет об использовании 3 миллиардов долл., полученных от России под большие % (500 миллионов долларов)

2. В Украине ни копейки из этих средств не направлялось на финансирование

реальних программ развития Украины.

3. Не был проведён финансовый аудит Минфином Украины. Более того, служба финансового мониторинга Украины, фининспекция преступно уклоняется от расследований.

Исходя из выщеизложенного, заявляем:

- 1. Украина не имеет права оплачивать коррупционные схемы, не опровергнув вышеукзанные обвинения.
- 2. РФ не имеет права требовать оплаты за коррупционные махинации, пока не будут предоставлены доказательства, что деньги не были разворованы режимом Януковича.

Требуем:

- 1. От Генеральной прокуратуры РФ, Следственного комитета РФ, Генеральной прокуратуры Украины привлечь к уголовной ответственности руководителей финансовых учреждений за создание финансовой коррупционной схемы по выводу из России денег налогоплательщиков России, за воровство которых затем принуждают платить украинский народ да еще с большими процентами.
- 2. Возбудить уголовные дела за укрывательство и пособничество в сокрытии финансовых преступлений против участников коррупционной схемы расхищения средств, которые, возможно, покрываются Минфином Украины.
- 3. Допросить Януковича и причастных руководителей Минфина, которые не только скрывают преступления, но и надеятся на продолжения воровства денег как в РФ та и в Украине. Опубликовать показания, как эти патриоты Украины и России «облапошили» Россию.

КАО ОСУ не даст облапошить Украину!

Мы готовы направить экспертов для выявления коррупционных схем на территории России и Украины.

ГСУ заявляет о необходимости углубленной люстрации в Минфине Украины и призывает Президента Украины, а именно :

- 1. К люстрации и привлечению к ответственности чиновников, которые признают вышеобозначенный кооррупционный долг, который навязывается Украине.
- 2. Направить официальное письмо руководству РФ о непризнании долга в размере 3 миллиардов долларов как такого, что является коррупционным и не подлежит оплате согласно международных норм борьбы с отмыванием денег.
- 3 миллиарда долл. мы считаем необходимым направить на укрепление обороноспособности Украины и помощи пострадавшим от военных действий.

Обращение о поддержке настоящего заявления и организации общественного движения: «Коррупционные долги - Украина не платит!» мы направим к патриотическим организациям Украины и России, а также общественным деятелям. С уважением.

Член Совета ОО «Информационный банк,

«Киевская Русь»

Р.О. Бронина

# Case 1:16-cv-00586-KAM-VMS МІНІСТЕРСТВО ЗАКОРДОННИХ СПРАВ УКРАЇНИ

Михайлівська площа, І м. Київ, 01018, Україна



Page Molster PageID #:
OF FOREIGN AFFAIRS
OF UKRAINE

1 Mykhailivska Square Kyiv, 01018, Ukraine

Тел.: (044) 238 17 48; факс: (044) 238 18 88

E-mail: zsmfa@mfa.gov.ua Web: http://www.mfa.gov.ua Код ЄДРПОУ 00026620

19 листонада 2015 р. № 913/36-172/3- 1/6 Э.Э На лист АПУ № 12-06/1712 від 13.11.2015 Виконавчому директору «Міжнародного антикорупційного суду»

Р.Броніній

<u>blacklistew@mail.ru</u>

Щодо запиту Р.Броніної

Копія: Адміністрація Президента

України

## Шановна пані Броніна,

МЗС розглянуло Ваш лист № 0159011255 від 04.11.2015, переадресований Адміністрацією Президента України, та у межах компетенції повідомляє про відсутність у Міністерстві інформації про зазначені у запиті міжнародні угоди.

Заступник директора Департаменту політики і комунікацій-

начальник Управління

зв'язків зі ЗМІ

Олена Вашенко

-19-

Filed 02/01/16 Page 18 of 31 PageID #:

## НАШОНАЛЬНИЙ БАНК **YKPAÏH**II

вул. Інститутська, 9. м. Уайв. 01601. Українь теп, 253-38-22, факс 230-23-33, 253 ПТ-56 e-mail: nbula-bank.vev.ta

NATIONAL BANK OF UKRAINE

9. Januarsky Sto. Sect. March. Carante paren 253-28-21, fex 23(+2)(-33, 253-17-34 personal districtions (known and

13.11 2015 18-02013/84541

Благодійна організація «Фонд «Міжнародні антикорупційні суди» м. Київ-87, а/с 27, 03087, Україна

Щодо договірних зобов'язань Національного банку України перед Російською Федерацією

Національний банк України за результатами розгляду запиту Благодійної організації «Фонд «Міжнародні антикорупційні суди», наданого 05.11.2015 №0159011257, з питання наявності Угоди про залучення Національним банком України кредиту від Російської Федерації у спеціальних правах запозичення (СПЗ) Міжнародного валютного фонду повідомляє, що безпосередньо Національним банком України така Угода з російською стороною не укладалась.

Заступник Голови

Д.Р. Сологуб

Війтєва (253 05 49)





# Адміністрація Президента України

Головний департамент забезпечення доступу до публічної інформації

13.11.2015 No 12-08/1713
Ha № 2156 Gy 09.11.2015

Виконавчому директору Міжнародного антикорупційного суду

## Р.БРОНІНІЙ

03087, м. Київ-87, a/c 27

## Шановна пані Броніна!

На Ваш запит від 9 листопада 2015 року стосовно місцезнаходження міжнародної угоди між Україною та Російською Федерацією щодо надання позики повідомляємо, що згідно зі статтею 23 Закону України «Про міжнародні договори України» оригінали міжнародних договорів України зберігаються у Міністерстві закордонних справ України.

Відповідно до пункту 3 статті 22 Закону України «Про доступ до публічної інформації» Ваш запит надіслано належному розпоряднику інформації — Міністерству закордонних справ України.

Дякуємо за Ваш запит.

3 повагою

Заступник Керівника Головного департаменту забезпечення доступу до публічної інформації Адміністрації Президента України

В.Петров





# Коаліція антикорупційних організацій Громадський Суд України

03087, Україна, Київ-87, a/c 27, tel.: +38 067 398-80-57, e-mail: blacklisteu@mail.ru

№0142014/1 від 20.11.14

Надіона ізецій Банк
Україєн

мет 2 0 / НС 2014

ДОКУМЕНТ ПРИЙНЕТО

Прем'єр-міністру України А.П. Яценюку (особисто) Копія: новообраним народним депутатам України

#### Заява

# про впровадження надійної системи фінансового захисту України та притоку додаткових фінансових ресурсів

Коаліція антикорупційних організацій Громадський Суд України (далі — КАО ГСУ) звітує про чергову міжнародну перемогу в захисті інтересів України. Наші офіційні вимоги з доказовою базою до В.Путіна про невідкладне замороження та подальше скасування корупційного боргу України в розмірі 3 мільярдів доларів, що в грудні 2013 за шахрайською схемою були виведені з Росії та нав'язані як фінансові зобов'язання України (зі знущальною практикою змушувати платити народ України за російські оборудки по 250 мільйонів доларів щорічно , по 8% «панського оброку»), були визнані та імплементовані. Цинізм і знущання над Україною полягали не тільки в сплаті знущального «оброку» , а й в тому, що цей «оброк» міг стати частиною фінансування кампанії по знищенню українців на Донбасі.

Нашої аргументації та доказової бази було достатньо для того, щоб Президент Російської Федерації В.В. Путін на Саміті Великої двадцятки (G20) в Австралії зробив офіційну заяву та особисто публічно повідомив, що Росія поки не має наміру стягувати з українців борг грудня 2013 року в 3 мільярди доларів.

І тепер В.Путін чекає, коли не тільки антикорупційні сили, але й Уряд України виконає остаточні процедури щодо скасування цього ганебного боргу, адже В.Путін офіційно виказав готовність до скасування боргу, а чиновники фінансових відомств України, використовуючи своє службове положення, нажаль, переховуються від фінансового захисту України. Отже, необхідно на урядовому рівні здійснити повну процедуру по скасуванню зазначеного боргу.

Виходячи з вищевикладеного, наголошуємо про особливу нагальність нашої пропозиції щодо забезпечення фінансового захисту України та створення об'єднаного центру міжнародного фінансового захисту України з представників громадськості та провідних профільних урядових відомств. Такий центр заблокує містечкові відомчі антипатріотичні інтереси, міжвідомчу волокіту та «перетягування канату» — кому що робити. Ми гарантовано за 10 днів зможемо розгорнути широку роботу такого центру са за 6 місяців - за різними напрямками забезпечити притік до 10 мільярдів доларів дозаткових ресурсів до України.

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Фінансування та структурних ресурсів на 1-му етапі для створення такого центру не потрібно, а отже, немає жодного бар'єру для його створення.

Просимо офіційно підтримати нашу патріотичну програму по захисту та розвитку України та внести пропозиції щодо кандидатур з Вашого боку для роботи Об'єднаного центру міжнародного фінансового захисту України.

Гальмування нашої ініціативи  $\epsilon$  зрадництвом України. Сподіваємось, що Президент, Уряд та новообраний парламент України не допустить такого зрадництва.

3 повагою,

Співголова Коаліції антикорупційних організацій

Громадський Суд України

Член Ради Комітету боротьби з соціальним злом

**Руслана Брон**іна

Filed 02/01/16 Page 22 of 31 PageID #:

DOCN

## ЦЕНТРАЛЬНЫЙ БАНК РОССИЙСКОЙ ФЕДЕРАЦИИ (Банк России)

Административный департамент

blacklisteu@mail.ru

Брониной Р.О.

107016, Москва, ул. Неглинная, 12

OT 18. 03. 2015 2 No 10-1-4/2432

О рассмотрении обращения Брониной Р.О.

2 %

# Уважаемая Руслана Олеговна!

Ваше обращение, поступившее в Центральный банк Российской Федерации из Управления Президента Российской Федерации по работе с обращениями граждан и организаций, рассмотрено и принято к сведению.

Заместитель начальника Управления документооборота

И.А. Семагин

- 24-





# International Anti-Corruption Court (IACC, ID 40019132)

03087, Ukraine, Kiev, Post box 27, tel.: +38 067 398-80-57, e-mail: blacklisteu@mail.ru, erisp.com-member of CAO IACC

№ 01511120345 ot 11.12.15

Президенту Российской Федерации В.В.Путинч

## Предсудебный запрос

Международный антикоррупционный суд проводит судебную компанию го аннулированию финансовых обязательств Украины (в том числе, 3-х миллиардоз долларов США перед Российской Федерацией), которые согласно наших эксклюзивных исков в судах США и ЕС и независимой доказательной базы для судебных процессов э станут основанием для признания таких финансовых незаконности таких займов обязательств как коррупционных, а следовательно, подлежащих с-иньводилунны согласно Конвенции ООН против коррупции.

Поскольку ряд. Правительственных ведомств: Украины признали факт отсутствия в Украине каких-либо официальных соглашений о заимствовании у Российской Федерации 3-х миллиардов долларов США (или 15 миллиардов долларов США), опровергнуть такое утверждение об отсутствии соглашений (договоров), а если такие соглашения имеют место, то подтвердить это заверенной копией соглашений, направленной в наш адрес.

Оставляем за собой право использовать этот запрос и предоставленный Вамы ответ в судебных процессах.

> АНТИНОРУПЦИНІ СУДИ" FOND INTERNATIONAL NTI-CORRUPTION COURT Ідентифікаційни

С уважением,

Исполнительный директор

Международного антикоррупционного суда

Руслана Бронина

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# МІНІСТЕРСТВО ФІНАНСІВ УКРАЇНИ

(Мінфін)

вул. Грушевського, 12/2, м. Київ, 01008, тел. (044) 206-59-47, 206-59-48, факс 425-90-26 E-mail: infomf@minfin.gov.ua Код ЄДРПОУ 00013480

17.11.2015	№	31-121210-27/28-702/715
Ha №	 від	

БО «Фонд «Міжнародні антикорупційні суди» м. Київ-87, а/с 27 03087

Міністерство фінансів України на виконання доручення Секретаріату Кабінету Міністрів України від 11.11.2015 № 18536/0/2-15 розглянуло запит благодійної організації «Фонд «Міжнародні антикорупційні суди» щодо отримання Україною кредиту від Росії в розмірі 3 млрд. дол. США і в межах компетенції повідомляє.

Відповідно до частини 1 ст.16 Бюджетного кодексу України, державні запозичення здійснюються в межах, визначених законом про Державний бюджет України, з дотриманням граничного обсягу державного боргу на кінець бюджетного періоду.

Державне запозичення – операції, пов'язані з отриманням державою кредитів (позик) на умовах повернення, платності та строковості з метою фінансування державного бюджету.

Право на здійснення державних внутрішніх та зовнішніх запозичень належить державі, в особі члена Кабінету Міністрів України, відповідального за формування та реалізацію державної бюджетної політики, або особи, яка виконує його обов'язки, за дорученням Кабінету Міністрів України.

Кабінет Міністрів України визначає умови здійснення державних запозичень, у тому числі вид, валюту, строк та відсоткову ставку державного запозичення.

Умови випуску облігації зовнішньої державної позики затверджено постановою Кабінету Міністрів України від 18 грудня 2013 року № 904 «Про здійснення державних зовнішніх запозичень у 2013 році», відповідно до якої облігації випускалися в доларах США, загальним обсягом емісії на суму 3 000 млн. доларів США за номінальною вартістю однієї облігації 200 тис. доларів США та/або більшу суму, що є цілим числом, кратним 1 тис. доларів США, за ставкою 5,0% річних. Строк погашення облігацій - 20 грудня 2015 р.

Згідно норм англійського права угоди, які були укладені при розміщенні ОЗДП, є конфіденційними та не можуть надаватись третім особам.

Основним документом, на підставі якого здійснюється розміщення облігацій, подальший їх обіг та погашення, є Проспект емісії, в якому зазначаються усі суттєві умови випуску зазначених ОЗДП, що пропонуються до Проспект емісії ОЗДП, що проходить лістинг на Ірландській фондовій біржі, складається англійською мовою у відповідності із Директивою Європейського Парламенту про Проспекти 2003/71/ЕС та затверджується Ірландським центральним банком. Після затвердження Проспект емісії стає публічно доступним та розміщується на офіційному веб-сайті Ірландської вільному http://www.ise.ie/Market-Dataфондової біржі доступі Announcements/Debt/Individual-Debt-Instrument-Data/.

Заступник Міністра з питань європейської інтеграції



# МІНІСТЕРСТВО ФІНАНСІВ УКРАЇНИ

(Мінфін)

вул. Грушевського, 12/2, м. Київ, 01008, тел. (044) 206-59-47, 206-59-48, факс 425-90-26 E-mail: infomf@minfin.gov.ua Код ЄДРПОУ 00013480

13.	01	2015 No	·	31-12120-27-27/	711
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Броніна Р. поштова скринька 27 м. Київ, 03087

## Шановна пані Руслано!

Міністерство фінансів України на виконання доручення Секретаріату Кабінету Міністрів України від 22.12.2014 №43151/2/1-14 до Адміністрації Президента України від 17.12.2014 №44-01/1301 стосовно питань, пов'язаних з державними запозиченнями в межах компетенції повідомляє.

Міністерство фінансів України проводить зважену політику державних запозичень. Випуск облігацій зовнішньої державної позики (далі - ОЗДП) здійснюється на виконання Закону України про Державний бюджет на відповідний рік. Розміщення ОЗДП та їх обіг відбувається на міжнародних ринках капіталу відповідно до міжнародного законодавства. Уповноваженими на здійснення такого випуску є провідні міжнародні інвестиційні установи (переважно банки), які діють у якості лід-менеджерів випуску ОЗДП.

Несприятлива ситуація на світових фінансових ринках, яка склалася у другій половині 2013 року, унеможливила розміщення ОЗДП Міністерством фінансів України на прийнятних умовах для забезпечення безумовного фінансування державного бюджету.

України Міністерством фінансів 20.12.2013 здійснено випуск єврооблігацій обсягом 3 млрд. дол. США, на які нараховується дохід за ставкою 5 відсотків річних, що сплачується двічі на рік (умови випуску ОЗДП 2013 року затверджено постановою Кабінету Міністрів України від 18 грудня 2013 р. № 904 «Про здійснення державних зовнішніх запозичень у 2013 році»).

Слід зазначити, що на міжнародних ринках капіталу відсоткові ставки за ж аналогічними ОЗДП у другій половині 2013 року досягали рівня понад

10 відсотків річних.

З повагою

Заступник Міністра

В. ЛІСОВЕНКО



# International Anti-Corruption Court (IACC, ID 40019132)

03087, Ukraine, Kiev, Post box 27, tel.: +38 067 398-80-57, e-mail: blacklisteu@mail.ru, eriip.com-member of CAO IACC

№ 01599111428 from 27.11.15

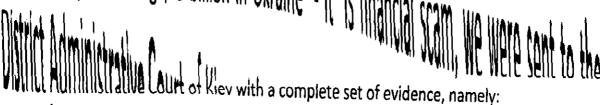
To the Managing Director International Monetary Fund Ms. Christine Lagarde

Complaint - protest against financial fraud of V. Putin at the expense of EU and US taxpayers

International anti-corruption court declares about incompetent assessment of financial fraud, implemented by the President of the Russian Federation Vladimir Putin and ex Ukrainian Prime Minister Nikolai Azarov, that in 2013 by a criminal way, violating more than 10 laws of national and international law, have conducted an operation to withdraw from Russia and laundering in Ukraine \$ 3 billion of money of Russian people with further their plundering (of the Irish Stock Exchange).

Ukrainian authorities, relying on the recent IMF estimate about that the debt of \$ 3 billion is a state (sovereign) debt of Ukraine, (but not corruption debt), does not expose scammers, and extort from the American and the people of the European Union to compensate these \$ 3 billion of corruption and stupidity.

Our investigations and the evidence base that the above transaction between Azarov and Putin by laundering \$ 3 billion in Ukraine - it is financial from IIIA IIIA.



- 1. Any agreements on borrowing by Ukraine from Russia no \$3 billion, no \$15 billion does not exist.
- 2. Money in the amount of \$ 3 billion has been taken from the National fund of welfare of the Russian Federation, contrary to law "Resolution of the Government of the Russian Federation from January 19, 2008 № 18 "On the Management of the National Welfare Fund ".
- 3. Mr. Azarov, in his turn, issued a resolution of Cabinet of Ministers of Ukraine from December 18, 2013 №904 "On state external borrowing in 2013", also contrary to the will of the Ukrainian people, Law of Ukraine "On State Budget of Ukraine for 2013", Budget codex of Ukraine, unauthorized way single-handedly used his official position, allowing on the balf of Ukraine exceed the limit of external borrowings by \$ 3 billion, without

- Art. 34 of the UN Convention against Corruption,
- \$ 3 billion under the laws of direct action are recognized corrupt and anti-popular and are subject to cancellation.

Thus, unfortunately, the IMF experts have been misled by Ukrainian corruptionists concerning the 3 billion Ukraine's debt before Russia. Still more, anti-corruption department of the IMF criminally had ignored directed by us earlier statements—about the facts of corruption upon bond placement by Ukraine at the amount of \$ 3 billion.

As a result of this package of corruption violations and low professionalism of IMF experts, instead of exposing the corrupt scam of V.Putin and Yanukovich had happened compulsion to pay a debt of \$ 3 billion to V.Putin, at the expense of EU taxpayers' money, because this money is already been plundered, but other sources to cover up the fraud are no.

We ask the international financial institutions to protect the interests of EU taxpayers, to prevent servile humiliation of the people to pay for the debts of thieves and swindlers, which together have gathered in Russia and with curiosity watching process of capitulation Ukraine and EU in created by them the scam.

We ask the competent authorities to institute criminal proceedings on the fact of falsification of documents by the Ministry of Finance of Ukraine, which, apparently, on the orders of Vladimir Putin (who at all levels said that the IMF must help Ukraine to pay off with Russia), officially declares, that agreement on \$3 billion there is, and necessary repay this debt, but the Ministry of Foreign Affairs of Ukraine and the National Bank of Ukraine argue that such agreement is not and was not.

We ask take measures to the Government of Ukraine, to prevent the implementation of the plan of Putin and Yanukovich to force the American people to pay for the stolen and laundered by them \$ 3 billion, send a note of protest to the Government of Ukraine to annul the criminal Resolution of Cabinet of Ministers of Ukraine from December 18, 2013 №904 "On state external borrowing in 2013" and according to the Law of Ukraine "About International Private Law" to conduct a judicial procedure annulment the corrupt debt of Ukraine before Russia.

Sincerely Yours,

Executive Director of International anti-corruption court

Ruslana Bronina

- 30 -



# **International Anti-Corruption Court (IACC, ID 40019132)**

03087, Ukraine, Kiev, Post box 27, tel.: +38 067 398-80-57, e-mail: blacklisteu@mail.ru, www.eriip.com -member of CAO IACC

№ 0159014273 from 06.10.15

To the Managing Director International Monetary Fund Ms. Christine Lagarde

#### Statement

## on the recognition of the debt in the amount of \$ 3 billion. Ukraine before Russia as a corrupt

Within the framework of investigation of corruption money laundering schemes in Russia and smuggled goods flows from Russia members of the Coalition anticorruption organizations International Anti-Corruption Court in 2014 established the fact of corrupt collusion between the Ministry of Finance of the Russian Federation and the President of Ukraine V. Yanukovich on money laundering of the people of Russia in Ukraine, and their transfer into the possession of private individuals.

With this purpose from Russia to Ukraine in December 2013 have been directed \$ 3 billion and to obtain additional funds to launder these 3 billion Russia named such financing a credit with an 8% rate. Using the chaos resulting from armed conflicts and bloodshed in the government quarter of Ukraine, Yanukovych and his entourage have stolen whole the aforementioned credit, forcing the people of Ukraine pay and 3 billion loan, and 250 million per cent.

By us formed the evidence base, that so-called Eurobonds in \$ 3 billion from Russia to Ukraine has signs of corruption. After that, we sent an appeal to the central authorities of Ukraine and Russia with the requirement to recognize this duty as corrupt and take the appropriate government measures, namely:

- to create a commission to verify the facts of corruption with the participation of our representatives:
- stop all financial settlements before recognition by the court of corruption or legality granting of Eurobonds

President of Russia Vladimir Putin at the G20 Summit in Australia in November 2014, having studied our requirements for recognition of debt of in 3 billion as corrupt, declared at the press conference, that Russia does not require \$ 3 billion from the Ukraine and is ready to cooperate with Ukraine for the resolution of all issues related to the cancellation of corrupt financial obligations of Ukraine.

However, the Government and the Ministry of Finance of Ukraine, unfortunately, did the opposite and instead start the procedure of recognition of the debt at 3 billion as a corruption scheme of money laundering Russia in Ukraine steel at protecting the crooks of Yanukovych and Ministry of Finance of Russia and adopted the scam to perform. No commission was established to verify the structure of corruption, has not been sued for recognition of structure of corruption.

Because the money in Ukraine to return the debt in 3 billion there are no, they are stolen, reimburse the debt of scams will taxpayers of Europe and America, directing additional financial assistance to Ukraine. Is therefore, in order to prevent losses for the peoples of America, we call on the European Commission, the Government of the United States, European and worldwide financial regulators and controllers take urgent action to the Government of Ukraine and Russia, not to give implement a financial fraud, stop the process of debt repayment in December 2015 for the recognition of it as corrupt.

We, for our part, are ready to participate in the courts and give evidence in commissions, working Group about the corrupt conspiracy between Ukraine and Russia.

Sincerely Yours,

Co-Chief of International anti-corrupt court

Ruslana Bronina

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# International Anti-Corruption Court

03087, Ukraine, Kiev-87, Post box 27, tel.: +38 067 398-80-57, e-mail: blacklisteu@mail.ru, 03087, Україна, м.Київ -87, а/с 27, Коаліція антикорупційних організацій Громадський Суд України

№ 01591141562 від 30.09.2015

Міністру внутрішніх справ України Арсену Авакову (особисто)

#### Запит про місцезнаходження Відповідача

В ході антикорупційних розслідувань злочинів уряду Азарова проти України членами Коаліції антикорупційних організацій Громадський Суд України (далі -КАО ГСУ) було встановлено факти використання службового становища М.Я. Азаровим під час перебування ним на посаді Прем'єр-міністра України для створення нормативних документів та шахрайських оборудок, метою яких є передача кращих державних земель України площею 3 мільйони га іноземцям або потенційним ворогам України. Офіційною підставою для такої анексії кращих земель України в центрі України можуть слугувати боргові зобов'язання українських підприємств, навіть не держави. Цинізм оборутки Азарова полягає в тому, що кредити розкрадають приватні особи, а за розкрадені кредитні ресурси зобов'язана розраховуватись перед іноземцям держава народною землею.

Нажаль, цей пакет урядових документів, виданих Азаровим та профільними міністрами, не скасований до цього часу та складає загрозу беззбройної окупації значних територій України іноземцями.

На виконання ст. ст. 9, 13,40, 65, 68 Конституції України, п.9 ст.74 Цивільно-процесуального кодексу України та громадянського обов'язку захисту Вітчизни, з урахуванням можливої змови М.Я. Азарова як керівника «Комітету спасіння України» з Міністром агропромислової політики України п. Ігорем Швайкою та іншими причетними керівниками державних відомств, що формують інші рятівно-окупаційні організації, метою яких, мабуть, є реалізація раніш намічених цілей для передачі земель іноземцям чи ворогам, а також в зв'язку з підготовкою до судового процесу про визнання дій чиновників корупційними та подальшого скасування виданих ними нормативних документів, просимо установити та інформувати про місце постійного проживання:

- Азарова Миколи Яновича екс-прем'єр-міністра України, народного депутата України 1. кількох скликань.
- Швайки Ігоря Олександровича екс-міністра аграрної політики України, народного 2. депутата України.
- Пахачук Галини Данилівни директора Департаменту боргової та міжнародної фінансової політики Міністерства фінансів України.
- Павленко Олексія Михайловича Міністра аграрної політики України. 4. Оскільки справа є невідкладною, прошу надати інформацію протягом 5 днів.

3 повагою, Виконавчий директор Міжнародного антикорупційного суду

Руслана Броніна

256-16-22/

Отрешано в прид напом